



971 South Clearwater Loop · Post Falls, ID 83854 · T 208 777 4709 · F 208 777 4708 · www.ednetics.com

Ednetics Response Comments in the E-Rate Reform Docket WC Docket No. 13-184

Ednetics has been serving the education community since 1997 delivering IT solutions, services and support. Ednetics offerings include wired and wireless network, virtualization, VoIP, classroom AV, campus security, IP access control and video surveillance, interconnected VoIP, high performance connectivity, helpdesk support and more. Ednetics is a proponent of the E-rate program seeing major benefits in the rural and socioeconomically challenged schools as well all IT programs we serve. Ednetics ecosystem approach to technology employs vendor models that create opportunities for integration. Our approach not only supports integration it increases the utility and lifecycle of our solutions. Ednetics has shown leadership in driving down costs for connectivity and improving transparency market-wide. We have four general comments in response to the WC Docket No. 13-184 on the following topics: Maintain a Competitively Neutral Program, Improvement in Administration Efficiency and Program Transparency, Eligible Services and Program Funding.

1. Maintain a Competitively Neutral Program

Allow for an even, fair and competitive field. All competitors should be treated equally. State networks, incumbents, regional networks and other competitors should be provided the same level playing field to provide services to schools and libraries and encourage the development of new networks and services.

Bidding as a consortium is already allowed in the program and this should continue, however, this should not become a mandate and should not receive application priority. When state run networks are awarded as exclusive contracts to a single vendor for the convenience of administration, costs can be adversely effected. Allowing fewer providers to participate greatly reduces the incentive for other companies to invest in infrastructure.

The current system makes it difficult to switch providers, as it does not provide funding for transition of services or bridge funding. This should be allowed in cases where the new service provides a better value than existing services.

Agrees with commenters that the Commission should not favor consortia, state networks or publicly owned networks. (Comptel, CentryLink and other providers)

2. Improvement in Administration Efficiency and Program Transparency

Substantial improvements need to be made in the transparency of the administrative holds for funding and invoice payment. The current USAC practice to freeze a provider's SPIN has resulted in considerable abuse in highly competitive situations where another provider (either public or private) is unhappy with award decisions. There is no

disincentive for competitors who fraudulently whistle-blow on their competition. This creates a high risk for providers that are making large investments to build infrastructure.

Ednetics agrees with proposals that includes more transparency in regards to the reason for the hold and a specific timeline for completion of review. This timeline should be as expedient as possible to reduce the impact to applicants and providers. Holds should not be permitted for unsubstantiated complaints and recourse should be provided for intentional usage of this process for competitive advantage or to harm a provider.

Billed Entity Applications for Reimbursement (BEAR) payments should process directly to applicants. The service provider acting as an intermediary create additional overhead and creates potential delays of payment to applicants.

We oppose record retention of ten years due to increased administrative burden.

We oppose the requirement of an officer to certify Forms 472, 473 and 474 due to the number of documents and that direct knowledge of all details would be overly burdensome.

Agree with commenters Comptel, Windstream CentryLink and other providers.

3. Eligible Services

Ednetics supports proposals to eliminate funding for outdated services, but does not support the elimination of high demand funding for voice services. Voice services are critical to operational efficiency in education environments. The elimination of high demand funding for these services would reduce options for schools and libraries with the greatest need for competitive options.

Ednetics supports comments related to the continued eligibility of dark fiber services. Allowing diverse connectivity options to applicants increases competitive options and reduces program costs over time. In addition, new fiber builds may allow competitive options for other services and the participation of additional providers.

Agree with commenters Comptel and other providers.

4. Program Funding

Supports proposals that create a permanent increase to the funding cap of the program. The importance of connectivity has increased dramatically since the inception of this program while funding has remained relatively fixed. In addition, Ednetics supports the proposal for a periodic review of the funding cap to ensure that there is funding to address the needs and goals of the program.

Supports proposal of the creation of additional funding directed at supporting capital investment costs for deploying new high-capacity broadband where services are not available or have limited competitive options.

Agree with commenters LAUSD, Houston ISD, SHLB Coalition and other providers.